Harriers Banbury Academy

SAFEGUARDING AND CHILD PROTECTION POLICY

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Date of next review:	July 2027	Owner:	Trust Safeguarding Lead
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Policy Consultation & Review

This policy is available on our academy website and is available on request from the academy office. We also inform parents and carers about this policy when their children join our academy and through our academy newsletters.

We recognise the expertise our staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis and we therefore invite staff to contribute to and shape this policy and associated safeguarding arrangements.

The policy is provided to all staff at induction alongside our Staff Code of Conduct. In addition, all staff are provided with Part One of the statutory guidance *'Keeping Children Safe in Education'*, DfE (2026).

This policy will be reviewed in full and agreed on an annual basis by the Aspirations Safeguarding Lead in conjunction with the Harriers Banbury Academy's Regional Board (RB) and staff members of the academy designated by the Principal. Following each such annual review the revised policy shall be reported to them. This policy was last reviewed on 1st September 2026. It is next due for review on 1st September 2027.

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1. PURPOSE & AIMS

1.1 The purpose of Harriers Banbury Academy's safeguarding policy is to ensure every child and young person who is a registered pupil at our academy is safe and protected from harm. This means we will always work to:

- Provide help and support to meet the needs of pupils as soon as problems emerge;
- Protect children and young people at our academy from maltreatment, whether that is within or outside the home, including online;
- Prevent impairment of our children's and young people's mental and physical health or development;
- Ensure that children and young people at our academy grow up in circumstances consistent with the provision of safe and effective care;
- Undertake that role so as to enable children and young people at our academy to have the best outcomes.

1.2 The academy aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

1.3 This policy will give clear direction to staff, volunteers, visitors and parents about expected behaviour and our legal responsibility to safeguard and promote the welfare of all children at our academy.

1.4 This policy applies to all pupils, staff, parents, governors, volunteers and visitors, including supply teachers.

2. OUR ETHOS

2.1 The child's welfare is of paramount importance. At Harriers Banbury Academy, there is a whole school approach to safeguarding and all systems, policies and procedures have been devised with the best interests of the child at the centre. Our academy will establish and maintain an ethos where pupils feel secure, are encouraged to talk, are listened to and are safe. Children at our academy will be able to talk freely to any member of staff at our academy if they are worried or concerned about something.

2.2 Everyone who comes into contact with children and their families has a role to play in safeguarding children. We recognise that staff at our academy play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating. **All staff are advised to maintain an attitude of '*it could happen here*' where safeguarding is concerned.** When concerned about the welfare of a child, staff members must always act in the **best interests** of the child.

2.3 All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information. We will not make promises to any child and we will not keep secrets. Every child will know what the adult will have to do with any information they have chosen to disclose.

2.4 Throughout our curriculum we will provide activities and opportunities for children to develop the skills they need to identify risks and stay safe, including when online. This may include covering relevant issues through Relationships Education and Relationships and Sex Education and will also

include material that will encourage our children to develop essential life skills through various teaching and learning opportunities as part of providing a broad and balanced curriculum.

2.5 At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (2026) and the Local Safeguarding Children Partnership

2A EQUALITY STATEMENT

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 9)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 11)
- Are missing from education or persistently absent from school
- Have a parent/carer who has expressed an intention to remove them from school to be home educated

3. ROLES AND RESPONSIBILITIES

Role	**Name**	**Contact details**
Designated Safeguarding Lead (DSL)	Joanna Agate	jagate@harriers-aspirations.org
Deputy DSL(s)	Antoinette Stephens	astephens@harriers-aspirations.org
Principal	Matthew Rabiasz	mrabiasz@harriers-aspirations.org
Named Safeguarding Governor	Mandy Lancy	mandylancy@aspirationsacademies.org
Trust Safeguarding Lead	Mandy Lancy	mandylancy@aspirationsacademies.org

All Staff

3.1 It is the responsibility of *every* member of staff, volunteer and regular visitor to our academy to ensure that they carry out the requirements of this policy and, at all times, work in a way that will

safeguard and promote the welfare of all of the pupils at this academy. This includes the responsibility to provide a safe environment in which children can learn, both offline and online.

3.1a All staff working in or on behalf of Harriers Banbury academy, including those who do not work directly with children, are expected to read and understand at least Part One of Keeping Children Safe in Education 2026. The academy will ensure that appropriate arrangements are in place to support staff to understand and discharge their safeguarding responsibilities.

3.1b All staff should be aware of our arrangements for community-based early help and targeted family help and understand their role in identifying pupils who may benefit from support before statutory intervention and be aware of local safeguarding partnership arrangements and understand the referral pathways to CSCS.

This policy should also be read alongside section 3 of the Early Years Foundation Stage statutory framework.

The Regional Governing Board (RB)

3.2 The RB of Harriers Banbury Academy is accountable for ensuring the effectiveness of this policy and our compliance with it. Although our RB takes collective responsibility to safeguard and promote the welfare of our pupils, we also have a named governor who, alongside the DSL, champions safeguarding within the academy.

3.3 **The Regional Board** will ensure that:

- There is a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- The safeguarding policy is in place and is reviewed annually, is available publicly via our academy website and has been written in line with the requirements of the Local Safeguarding Children Partnership policies and procedures;
- The academy contributes to inter-agency working in line with Working Together to Safeguard Children (2023);
- A senior member of staff from the leadership team, with the appropriate skills and experience, is designated to take the lead responsibility for safeguarding and child protection and that there is at least one deputy DSL who is appropriately trained to deal with any issues in the absence of the Designated Safeguarding Lead (DSL);
- A link governor trustee is appointed to monitor the effectiveness of this policy in conjunction with the full governing board;
- Procedures are in place for dealing with allegations against members of staff, including supply teachers and volunteers, and staff of organisations that hire the academy premises, in line with statutory guidance;
- Safer recruitment practices are followed in accordance with the requirements of *'Keeping Children Safe in Education'* DfE (2026);
- The DfE filtering and monitoring standards https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges are reviewed annually by the academy's Online Safety team, to ensure that the academy is doing all it can to limit children's exposure to safeguarding risks online;
- Remedy is made without delay to any weakness in regard to our safeguarding arrangements that are brought to their attention.

3.4 The Regional Board will receive a safeguarding report termly that includes the training that has taken place, the number of staff attending and any outstanding training requirements for the academy. It will also state all safeguarding activity that has taken place, for example, number of

meetings attended, reports written, training or induction given. It will not identify individual pupils or go into any detail.

The Principal

3.5 At Harriers Banbury Academy the Principal is responsible for:

- Identifying a senior member of staff from the leadership team to be the Designated Safeguarding Lead (DSL) and ensuring that they have appropriate skills, experience, time, funding,training and resources to carry out their role effectively;
- Identifying alternative members of staff to act as the Designated Safeguarding Lead (DSL) in his/her absence to ensure there is always cover for the role;
- Supporting the designated teacher for looked-after and previously looked-after children to promote the educational achievement of children who are looked after by the local authority, have left care through adoption, special guardianship or child arrangements orders, or were adopted from state care outside England and Wales;
- Ensuring that staff have the knowledge, skills and understanding necessary to safeguard and support looked-after and previously looked-after children, children with a social worker and children in kinship-care arrangements;
- Ensuring all staff receive a safeguarding induction and are provided with a copy of this policy and the staff code of conduct;
- Ensuring all staff undertake appropriate child protection training that is updated annually and includes training in online safety matters, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
- Ensuring that staff provide appropriate information and assistance to social workers and other agencies when children's social care becomes involved;
- Ensuring that pupils are provided with age-appropriate opportunities throughout the curriculum to learn about safeguarding and how to keep themselves and others safe, including online;
- Ensuring that clear roles and responsibilities are assigned for filtering and monitoring and that the effectiveness of the academy's filtering and monitoring arrangements is reviewed at least once every academic year by the responsible member of the Senior Leadership Team, supported by the DSL and IT staff, with a record retained of the checks undertaken;
- Ensuring that appropriate safeguarding due diligence is undertaken before commissioning alternative provision and that placements, provider arrangements and safeguarding risks are kept under regular review;
- Ensuring that the academy's approved policies and procedures, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff;
- Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures;
- Liaising with the Local Authority Designated Officer (LADO) in the event of an allegation of abuse being made against a member of staff, supply teacher or volunteer, and notifying the Trust's Safeguarding Lead and HR Director of any such incidences;
- Providing the governing body with sufficient information and assurance to enable it to scrutinise the effectiveness of the academy's safeguarding arrangements and confirm that those arrangements are implemented in practice.
- Ensuring that the relevant staffing ratios are met in EYs.

The Designated Safeguarding Lead (DSL)

3.6 The Designated Safeguarding Lead is a senior member of staff, from the leadership team, who takes lead responsibility for safeguarding and child protection (including online safety and filtering and monitoring systems and processes) within our academy. The DSL will carry out their role in accordance with the responsibilities outlined in Annex B of *'Keeping Children Safe in Education'*.

3.7 The DSL will provide advice and support to other staff on child welfare and child protection matters. Any concern for a child's safety or welfare will be recorded electronically via MyConcern which will be accessed by the DSL.

3.8 During term time the DSL and / or a deputy will always be available (during academy hours) for staff in the academy to discuss any safeguarding concerns. If in *exceptional* circumstances, the DSL or a deputy DSL is not available on the academy site in person, we will ensure that they are available via telephone and any other relevant media. Robust cover arrangements will be maintained during periods of illness, leave or other absence.
Appropriate DSL cover will also be available for academy activities taking place outside normal academy hours or during school holidays. Where necessary, availability may be provided remotely by telephone, video call or another secure means of communication.

3.9 The DSL at Harriers Banbury Academy will coordinate the academy's approach to community-based early help and targeted family help. They will ensure that representation from our academy is made at child protection conferences and core group meetings. With appropriate training, knowledge and experience, our DSL will liaise with Children's Services and other agencies where necessary, and make referrals of suspected abuse to Children's Services, take part in strategy discussions and other interagency meetings and contribute to the assessment of children.

3.10 The DSL will maintain records and child protection files ensuring that they are kept confidential and stored securely.

3.11 The DSL is responsible for ensuring that all staff members and volunteers are aware of our policy and the procedures they need to follow and have read at least Part One of KCSiE. They will ensure that all staff, volunteers and regular visitors have received appropriate child protection information during induction and have been trained within the academy to the agreed academy's safeguarding procedures.

3.12 The DSL will keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping.

3.13 The full responsibilities of the DSL are set out in their job description.

4. TRAINING & INDUCTION

4.1 When new staff join our academy they will be informed of the safeguarding arrangements in place. They will be given a copy of our academy's Safeguarding Policy along with the staff code of conduct, Part One and Annex A of '*Keeping Children Safe in Education*' and told who our Designated Safeguarding Lead (DSL) and Deputy DSLs are. **All staff are expected to read these key documents.**
All staff will sign a declaration at the beginning of each academic year to say that they have reviewed and understood the guidance and this may be confirmed by taking part in a KCSIE short assessment/quiz.

Staff will also be provided with the recording concerns method, given information on how to complete it and who to pass it to.

4.2 Every new member of staff or volunteer will receive safeguarding training during their induction period within the first 4 weeks of joining the academy. This programme will include:

- the child protection policy;
- the behaviour policy;
- the online safety policy and Acceptable Use Policy;
- the expectations, applicable roles and responsibilities in relation to filtering and monitoring processes in the academy;

- the staff behaviour policy (sometimes called a code of conduct);
- the safeguarding response to children who go missing from education;
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies);
- information relating to signs and symptoms of abuse;
- the early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment;
- how to manage a disclosure from a child.

The training will also include information about whistle-blowing in respect of concerns about another adult's behaviour and suitability to work with children. Staff will also receive training in online safety as this is part of the overarching safeguarding approach of our academy.

4.3 In addition to the safeguarding induction, we will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of '*Keeping Children Safe in Education'*. In order to achieve this we will ensure that:

- all members of staff will undertake appropriate safeguarding training on an annual basis in accordance with the Local Safeguarding Children Partnership advice and we will evaluate the impact of this training;
- all staff know how to manage disclosures;
- all staff know the indicators of abuse and neglect for specific safeguarding issues such as child criminal exploitation and child sexual exploitation;
- staff understand the need to be vigilant as multiple safeguarding issues will overlap with one another;
- all staff have an understanding of the expectations, applicable roles and responsibilities in relation to the filtering and monitoring systems and processes in the academy;
- staff are aware of the risk factors that increase the likelihood of involvement in serious violence;
- all staff know the academy's safeguarding response to children who are absent from education, particularly where absence is repeated or prolonged;
- all staff know the academy's Behaviour Policy and Staff Code of Conduct;
- all staff have training on allegations and safeguarding concerns about adults, including low-level concerns, and understand transferable risk and whistleblowing arrangements;
- all staff are aware of signs and symptoms of child-on-child abuse, including harmful sexual behaviour, sexual harassment, sexual violence, misogyny, misandry, serious physical violence and threats involving weapons;
- all staff are aware of child sexual exploitation, child criminal exploitation, county lines, trafficking and modern slavery;
- all staff know how to recognise and respond to concerns relating to female genital mutilation, forced marriage and honour or faith-based abuse;
- all staff know how to recognise and respond to concerns relating to radicalisation and the Prevent duty;
- All staff are aware of online safety, including the academy's filtering and monitoring systems, generative artificial intelligence, deepfakes, harmful online content and the making or sharing of nudes or semi-nudes, including AI-generated images; and
- mental health concerns that may also be safeguarding concerns, including self-harm, eating disorders, suicidal ideation and suicide risk;
- staff understand the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe;
- all staff members receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings), as required, but at least termly, to provide them with relevant skills and knowledge to safeguard children effectively;
- all staff members, governors and regular volunteers have access to the National College and TES Develop platforms and can access any of the webinars through this platform

- DSLs attend training every two years; and in addition to formal training, their knowledge and skills are refreshed at regular intervals, at least annually.
- The DSL, the deputy designated member(s) of staff and any other senior member of staff who may be in a position of making referrals or attending child protection conferences or core groups will participate in one of the multi-agency training courses available online or face to face through recognised training providers, at least once every three years
- Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process.
- DSLs attend all relevant local safeguarding training.

4.4 At Harriers Banbury Academy, we are alert to safeguarding issues in the local area and ensure that all staff have training appropriate to these matters as they arise. Currently, county lines, domestic abuse, substance abuse and neglect are a concern in this locality and are being addressed through SCIB support, ongoing local network training and work with the police and agencies.

4.5 All regular visitors, temporary staff and volunteers to our academy will be given a set of our safeguarding procedures; they will be informed of who our DSL and alternate staff members are and what the recording and reporting system is. (See Appendix 2).

4.6 We actively encourage all of our staff to keep up to date with the most recent local and national safeguarding advice and guidance, Annex A of '*Keeping Children Safe in Education*' (2026) provides links to guidance on specific safeguarding issues.

5. PROCEDURES FOR TAKING ACTION

5.1 At Harriers Banbury Academy all staff, volunteers and governors must follow procedures set out below in the event of a safeguarding issue. (Any reference to the DSL should be taken to mean the DSL or, in their absence, DDSL).

Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Social Care, or the police if:

- the situation is an emergency and the designated safeguarding lead, their deputy **and** the Principal are all unavailable;
- they are convinced that a direct report is the only way to ensure the pupil's safety.

If a child is suffering or likely to suffer harm, or in immediate danger

Tell the DSL immediately, if this is not possible then you should make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Tell the DSL as soon as possible if you make a referral directly.

The Oxfordshire Multi Agency Safeguarding Hub should be contacted immediately on 01865 519800, an online referral should be made shortly after. If appropriate the police should be called via 101.

https://www.oxfordshire.gov.uk/business/information-providers/multi-agency-safeguarding-hub

https://www.gov.uk/report-child-abuse-to-local-council

If a child/young person makes a disclosure to you, you should:

- ❖ Listen to and believe them. Allow them time to talk freely and do not ask leading questions

- ❖ Reassure the child/young person that they are being taken seriously and that they will be supported and kept safe. Victims shouldn't be given the impression they are creating a problem or made to feel ashamed for making a report;
- ❖ Stay calm and do not show that you are shocked or upset
- ❖ Tell the child/young person they have done the right thing in telling you. Do not tell them they should have told you sooner
- ❖ Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- ❖ Write up your conversation as soon as possible in the child/young person's own words. Stick to the facts, and do not put your own judgement on it (follow the Trust's reporting protocols)
- ❖ Sign and date the write-up and pass it on to the DSL using the Academy's reporting procedures set out in section 5.5 below. Aside from the DSL or DDSL, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

5.2 All staff are encouraged to report any concerns that they have, including concerns about any online activity, and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and dated records of concern could lead to a failure to protect.

5.3 It is *not* the responsibility of academy staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.

5.4 The Designated Safeguarding Lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our academy. Any member of staff or visitor to the academy who receives a disclosure of abuse or suspects that a child is at risk of harm must report it **immediately** to the DSL or, if unavailable, to the Deputy designated person. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff and/or take advice from local children's social care.

5.5 If staff are concerned about the welfare or safety of any child at our academy they will record their concern on the agreed electronic reporting system, My Concern, which will be passed to the DSL without delay, and at least by the end of the day.

5.6 Following receipt of any information raising a concern, the DSL will consider what action to take and seek advice from Early Help or Children's Social Care as required. Actions might include:
- managing any support for the child internally via the school or college's own pastoral support processes, including considering where doing so does not place the child at additional risk, whether the designated safeguarding lead (or a deputy) should inform parents or carers to further support the child's wellbeing,
- undertaking a family help assessment, or
- making a referral to statutory services,for example as the child could be in need, is in need or is suffering, or likely to suffer harm.

All information and actions taken, including the reasons for any decisions made, will be fully documented on MyConcern.

5.7 Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy **should raise their concerns with the Principal or the Trust's Safeguarding Lead**. If any member of staff does not feel

the situation has been addressed appropriately at this point, they should contact Children's Social Care directly with their concerns.

6. Children potentially at greater risk of harm

We believe that all children should be protected from harm, but recognise that some groups of children are potentially at greater risk of harm, both online and offline. To ensure that all pupils receive appropriate protection and support, we will give particular consideration to children who:

- are disabled, have special educational needs or certain medical conditions;
- are young carers;
- are pregnant or are parents themselves;
- are affected by parental substance misuse, domestic abuse, parental mental health needs or parental offending;
- are asylum seekers or refugees;
- are living away from home, in temporary accommodation or experiencing homelessness;
- live transient lifestyles or in chaotic and unsupportive home circumstances;
- are looked after, previously looked after or have a social worker;
- are vulnerable to bullying, prejudice, discrimination or social isolation;
- have communication needs or do not have English as their first language;
- are dependent on adults for personal or intimate care;
- may have difficulty recognising that behaviour towards them is abusive;
- have experienced repeated removal from the classroom, multiple suspensions or a part-time timetable, or are at risk of permanent exclusion;
- display early signs of abusive, violent or harmful behaviour;
- are at risk of child sexual exploitation, child criminal exploitation, trafficking or modern slavery;
- are at risk of female genital mutilation, forced marriage, or other honour or faith-based abuse;
- are involved in the court system or have a family member in prison;
- are at risk of serious violence, gang involvement or county lines;
- are lesbian, gay or bisexual;
- Are questioning their gender; or
- are at risk of being radicalised into terrorism.

This list provides examples and is not exhaustive. The Academy will consider each child's individual circumstances and ensure that safeguarding information and support are provided in accessible formats and, where appropriate, community languages.

6.1 Pupils with SEND or health issues

We recognise that children and young people with **special educational needs (SEN), disabilities or certain health conditions** can face additional safeguarding challenges and these are discussed in staff training. These additional barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- Pupils being disproportionately impacted by things like bullying- without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

At Harriers Banbury Academy, we identify pupils who might need more support to be kept safe or to keep themselves safe by:

- Communicating with a child's previous setting to ensure a safeguarding handover takes place
- Meet with parents before a place is formalised
- Sending an annual 'check in' survey each summer to ensure any new vulnerabilities are captured.

6.2. Pupils who need a social worker (Child in Need and Child Protection Plans)

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children and will seek support from the virtual school head.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- ❖ Responding to unauthorised absence or pupils who are absent from education where there are known safeguarding risks
- ❖ The provision of pastoral and/or academic support

6.3. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- ➢ Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- ➢ The DSL has details of children's social workers and relevant virtual school head

We have appointed a designated teacher, Rachel Thewlis (Jo Agate maternity cover), who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role. See also the policy for the Designated Teacher.

As part of their role, the designated teacher will:

- ➢ Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- ➢ Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

6.4 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputy/deputies, will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

6.5 A **private fostering arrangement** is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

Academy staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The academy itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the academy we will take steps to verify the relationship of the adults to the child who is being registered.

6.6 Children who are Absent from Education - Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about other safeguarding issues, including the sexual or criminal exploitation of children (CSE / CCE), in particular County Lines.

Our approach to absent pupils is designed to mitigate the risk of them becoming a child who is absent from education in the future.

We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parents/carers when pupils are not at school. This means we need to have at least two up to date contact numbers for parents/carers. Parents should be reminded to update the school as soon as possible if the numbers change.

Harriers Banbury academy has:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for pupils who are repeatedly absent or go missing from education.
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
- Procedures to inform the local authority when we plan to take pupils off-roll when they:

a. leave school to be home educated
b. move away from the school's location
c. remain medically unfit beyond compulsory school age
d. are in custody for four months or more (and will not return to school afterwards); or
e. are permanently excluded

We will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

6.7 Children requiring mental health support

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. They can also develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or suicide.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

The academy aims to prevent mental health problems by promoting wellbeing and resilience as part of an integrated, whole academy approach to social and emotional wellbeing, which is tailored to the needs of their pupils and learners. We seek support from our local Mental Health Support Team (MHST) as well as utilising other support available that might be suitable, for example early support hubs and young futures hubs.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 5.

If you have a mental health concern that is not also a safeguarding concern, speak to the DSL or the named mental health lead person to agree on a course of action.

6.8 Children who are questioning their gender

The Academy will provide a respectful and supportive environment for children who are questioning their gender. Bullying, harassment and discrimination will not be tolerated, and any related safeguarding or wellbeing concerns will be addressed promptly.

The Academy will not initiate social transition. Individual members of staff must not independently make changes relating to social transition, including changes to names, pronouns, uniform, facilities, sport or other arrangements.

Where a child or their parent or carer requests support involving social transition, the matter will be referred to the Principal and the DSL. The request will be considered through a careful, documented and case-by-case process.

Parents or carers will be involved as a matter of priority and their views will be given proper consideration. In the rare circumstances where there is reason to believe that involving parents or carers may place the child at increased risk, the DSL will determine what safeguarding action is necessary before parents are contacted or any decision is made.

Decisions will take account of:

- the welfare and best interests of the child and other children;

- the child's age, development, wishes and individual circumstances;
- any wider mental health, medical, neurodevelopmental or safeguarding needs;
- relevant clinical or other professional advice;
- the impact of agreeing or declining the request;
- the Academy's safeguarding responsibilities; and
- its duties under the Equality Act 2010 and Human Rights Act 1998.

Primary-age requests will be approached with particular caution. Staff will not provide clinical advice or undertake functions that require clinical expertise.

The Academy will explain that support with social transition will not include access to toilets, changing rooms, showers or residential accommodation designated for the opposite biological sex, or participation in sport designated for the opposite sex where single-sex participation is necessary for safety.

The child's biological sex will be recorded accurately. Information will only be shared with staff who need it to safeguard and support the child and other pupils. Decisions and their rationale will be recorded and reviewed where circumstances change, including where a child wishes to reverse or amend an earlier arrangement.

UNIVERSAL SERVICES AND COMMUNITY BASED EARLY HELP ASSESSMENT

In some cases, children may benefit from an early help assessment: health conditions, a mental health need, a family member in custody/prison or affected by parental offending, at risk of honour-based abuse such as female genital mutilation (FGM) or forced marriage, and persistent absence from education (including absences for part of the day) are some examples of concerns that may trigger an Early Help Assessment (EHA).

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

Providing help and support as soon as problems emerge is an important part of safeguarding children and promoting their welfare.

Universal services and community-based Early Help provide support at an early stage, before statutory intervention is required. Support may be delivered through education, health services, family hubs, youth services, housing services and voluntary or community organisations.

The DSL and Deputy DSL(s) will understand the local Early Help arrangements, threshold document and referral pathways and will ensure that staff know how to identify children and families who may benefit from additional support.

Where appropriate, the Academy will work with the child, their parents or carers and relevant agencies to:

- identify the child's needs and any emerging safeguarding concerns;
- consider the child's wishes and feelings;
- agree the support required and the outcomes to be achieved;
- coordinate services through an identified lead practitioner where appropriate; and
- regularly review whether the support is improving the child's circumstances.

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

Some children and families may require more targeted support than that available through universal or community-based Early Help. Family Help includes:

- targeted early help coordinated by the local authority and its partners; and
- statutory support and services for children in need under section 17 of the Children Act 1989.

Targeted early help is a voluntary arrangement and will ordinarily require the consent and participation of the child and their family. An appropriately qualified practitioner may lead the assessment and coordinate the Family Help plan. Where local arrangements permit, the same practitioner may continue to work with the family where the child is subsequently assessed as a child in need under section 17.

Where a child or family does not consent to targeted early help, or does not engage with the support offered, the DSL will consider whether the child's needs are likely to increase or whether there is a safeguarding risk that requires referral to local authority children's social care.

Family Help and Early Help cases will be kept under regular review. Where the child's circumstances do not improve, the support is not meeting their needs or concerns increase, the DSL will consider whether the matter should be escalated or referred for statutory assessment.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

EARLY HELP

In some cases, children may benefit from an early help assessment: health conditions, a mental health need, a family member in custody/prison or affected by parental offending, at risk of honour-based abuse such as female genital mutilation (FGM) or forced marriage, and persistent absence from education (including absences for part of the day) are some examples of concerns that may trigger an Early Help Assessment (EHA).

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

If Early Help is appropriate, the family will be offered a strengths and needs assessment to capture the areas of need. This will be sent to the Locality & Community Support Service (LCSS) for review and advice. Support may be offered by a single agency or a Team Around the Family may be offered for a multidisciplinary package.

7. RECOGNISING ABUSE

7.1 Allegations of abuse made against other pupils (Child on Child Abuse including harrassment and violence)

At Harriers Banbury Academy we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults and other students in the academy.

We recognise that children are capable of abusing other children and as such take a zero tolerance approach to abuse. Abuse will never be tolerated or passed off as "banter" or "having a laugh" or "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children and young people.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this safeguarding and child protection policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual harrassment, sexual violence or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including making or sharing nudes)
- Is 'upskirting' which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm

Although girls are more likely to experience sexual harassment and sexual violence, any child can be a victim, and abuse may occur between children of any age or sex. All children who report abuse will be taken seriously, supported and kept safe, regardless of how long it has taken them to come forward.

We recognise that child-on-child abuse may be occurring even where no reports have been made. Children may not feel ready or able to describe their experiences, may not recognise the behaviour as harmful, or may communicate their concerns indirectly through their behaviour, presentation or relationships. Reports may also be made by friends, parents or other adults, or arise from something witnessed or overheard by a member of staff.

Staff must act immediately where they have concerns about a child's welfare and must not wait for a direct disclosure.

Child-on-child abuse may include, but is not limited to:

- bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- abuse within intimate personal relationships between children;
- physical abuse, including serious physical assault and threats involving weapons;
- sexual harassment and sexual violence;
- harmful sexual behaviour;
- misogynistic or misandrist abuse and harassment;
- causing another child to engage in sexual activity without consent;
- making or sharing nudes and semi-nudes, including digitally altered or AI-generated images, deepfakes and "deep nudes";
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm;
- initiation or hazing-type violence and rituals.

Sexual behaviour exists on a continuum, ranging from developmentally expected behaviour through inappropriate and problematic behaviour to abusive and violent behaviour. The

Academy will consider the child's age, developmental stage, understanding, vulnerability, the nature and frequency of the behaviour, any difference in age or power and the wider context. Staff must never dismiss abusive or harmful behaviour as "banter", "just having a laugh", "part of growing up" or "boys being boys". Doing so can create an unsafe culture, normalise abuse and discourage children from reporting concerns.

Child-on-child abuse is preventable. The Academy will seek to identify concerns early and provide timely, appropriate and evidence-based support to reduce the risk of behaviour escalating.

If a pupil makes an allegation of abuse against another child:

- You must tell the DSL and record the allegation, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

We will minimise the risk of child on child abuse by:

1. Challenging any form of derogatory or sexualised language or behaviour, including abusive, misogynistic and misandrist behaviour
2. Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
3. Ensuring our curriculum helps to educate pupils about appropriate behaviour, healthy relationships,online safety, consent and how to seek help
4. Ensuring pupils know they can talk to staff confidentially and know that they will be listened to, by *indicating their trusted adults, making time for the pupil and finding a quiet space for the discussion.*
5. Ensuring staff reassure victims that they will be taken seriously
6. Ensuring staff are trained to understand:
    - That technology is a significant component in many safeguarding and wellbeing issues and that risks such as abuse can take place online as well as face to face

    o How to recognise the indicators and signs of child on child abuse, and know how to identify it and respond to reports

    o That even if there are no reports of child on child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"

    o That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

    Children can show signs or act in ways they hope adults will notice and react to

    A friend may make a report

    A member of staff may overhear a conversation

    A child's behaviour might indicate that something is wrong

    o That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

- That a pupil harming another child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

- The important role they have to play in preventing child on child abuse and responding where they believe a child may be at risk from it

- That they should speak to the DSL if they have any concerns

7.2 Consensual and Non Consensual Making or Sharing of Nudes and Semi Nudes (Youth produced sexual imagery / sexting)

In cases of this we follow the guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS) updated in 2024: https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people

Your responsibilities when responding to an incident

If you are made aware of an incident involving the making or **sharing** of **nudes or semi-nudes**, you must report it to the DSL immediately.

You must **not:**

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult

- ➢ There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- ➢ What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- ➢ The imagery involves sexual acts and any pupil in the imagery is under 13
- ➢ The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through either using the local neighbourhood police/school's officer or dialling 101

Recording incidents

All making or sharing of nudes or semi-nudes incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 7 of this policy also apply to recording incidents of this nature.

Curriculum coverage

Pupils are taught about the issues surrounding making of nudes / sharing nudes or semi-nudes as part of our PSHE education and computing programmes. Teaching covers the following in relation to this:

- ❖ What it is
- ❖ How it is most likely to be encountered
- ❖ The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- ❖ Issues of legality
- ❖ The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- ❖ Specific requests or pressure to provide (or forward) such images
- ❖ The receipt of such images

SCIB and Scarf resources are used to support curriculum coverage.

This policy on the making of or sharing of nudes or semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

7.3 Honour or Faith Based Abuse or Violence
At Harriers Banbury Academy we recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of **Female Genital Mutilation (FGM)** and other forms of so-called '**honour or faith-based' violence (HFBV)** and provide guidance on these issues through our safeguarding training (this encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including **FGM, forced marriage, and practices such as breast ironing**). All forms of so called HFBV are abuse (regardless of the motivation) and should be handled and escalated as such.
If you have a concern regarding a child that might be at risk of **HFBV** you must inform the DSL, as a matter of urgency, who will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

FGM - Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure.
Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; **and discuss any such cases with the DSL** and children's social care. The duty does not apply in relation to at risk or suspected cases.
Any member of staff who suspects a pupil is *at risk* of FGM or discovers that a **pupil age 18 or over** appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures.

Those failing to report such cases will face disciplinary sanctions. We will provide guidance and support to our teachers on this requirement and further information on when and how to make a report can be found in the following Home Office guidance: 'Mandatory Reporting of Female Genital Mutilation - procedural information' (October 2015).

FGM typically takes place between birth and around 15 years old; however,it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.

- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

7.4 Extremism (Prevent Duty)

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the '**Prevent Duty'.**

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the academy's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views

We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. At Harriers Banbury Academy, we will ensure that:

- Through training, staff, volunteers and governors have an understanding of what radicalisation and extremism is, why we need to be vigilant in school and how to respond when concerns arise.
- There are systems in place for keeping pupils safe from extremist material when accessing the internet in our academy by using effective filtering, monitoring and usage policies.
- The DSL has received Prevent training and will act as the point of contact within our academy for any concerns relating to radicalisation and extremism.

- The DSL will make referrals in accordance with Local Channel procedures and will represent our academy at Channel meetings as required.
- Through our curriculum, we will promote the spiritual, moral, social and cultural development of pupils.

7.5 CSE
The statutory definition of **Child Sexual Exploitation (CSE)** in the guidance document Child Sexual Exploitation: Definition and a guide for practitioners (DfE 2017)

The definition is:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.'

Indicators of child sexual exploitation may include:

• Acquisition of money, clothes, mobile phones, etc. without plausible explanation;

• Gang-association and/or isolation from peers/social networks;

• Exclusion or unexplained absences from school, college or work;

• Leaving home/care without explanation and persistently going missing or returning late;

• Excessive receipt of texts/phone calls;

• Returning home under the influence of drugs/alcohol;

• Inappropriate sexualised behaviour for age/sexually transmitted infections;

• Evidence of/suspicions of physical or sexual assault;

• Relationships with controlling or significantly older individuals or groups;

• Multiple callers (unknown adults or peers);

• Frequenting areas known for sex work;

• Concerning use of the Internet or other social media;

• Increasing secretiveness around behaviours; and

• Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

• Having a prior experience of neglect, physical and/or sexual abuse;

• Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);

• Recent bereavement or loss;

• Social isolation or social difficulties;

• Absence of a safe environment to explore sexuality;

• Economic vulnerability;

• Homelessness or insecure accommodation status;

- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such and should refer any concerns to the DSL.

7.6 CCE

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines - see below), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- ➢ Appearing with unexplained gifts or new possessions
- ➢ Associating with other young people involved in exploitation
- ➢ Suffering from changes in emotional wellbeing
- ➢ Misusing drugs and alcohol
- ➢ Going missing for periods of time or regularly coming home late
- ➢ Regularly missing school or education
- ➢ Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

7.7 County Lines

At Harriers Banbury Academy, we recognise that some of our vulnerable students may be at risk of being exploited by criminals.

Criminal exploitation is also known as 'county lines' and is when gangs and organised crime networks exploit children to sell drugs. Often these children are made to travel across counties, and they use dedicated mobile phone 'lines' to supply drugs

Gangs deliberately target vulnerable children through grooming, threatening or tricking them into trafficking drugs.

They might threaten a young person physically, or they might threaten the young person's family members. The gangs might also offer something in return for the young person's cooperation – it could be money, food, alcohol, clothes and jewellery, or improved status – but the giving of these gifts will usually be manipulated so that the child feels they are in debt to their exploiter.

Signs of criminal exploitation and county lines:

- ➢ Returning home late, staying out all night or going missing
- ➢ Being found in areas away from home
- ➢ Increasing drug use, or being found to have large amounts of drugs on them
- ➢ Being secretive about who they are talking to and where they are going
- ➢ Unexplained absences from school, college, training or work
- ➢ Unexplained money, phone(s), clothes or jewellery
- ➢ Increasingly disruptive or aggressive behaviour
- ➢ Using sexual, drug-related or violent language you wouldn't expect them to know
- ➢ Coming home with injuries or looking particularly dishevelled
- ➢ Having hotel cards or keys to unknown places.

You must inform the DSL if you have any reason to suspect a child is involved with drug trafficking.

7.7a Serious Violence

We are alert to the indicators which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

• being male • having been frequently absent or permanently excluded from school • having experienced child maltreatment and having been involved in offending, such as theft or robbery.

We are aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. And as such, we educate our pupils about how to keep safe when not on the school site, we also ensure that there is a staff presence on the school gates at these times of day. We will also work with the local VRU (Violence Reduction Unit) if possible to support a joined up approach to supporting our children and young people.

7.8 Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated

safeguarding lead) before the child or children arrive at school the following day. All police forces in the UK follow this procedure as part of Operation Encompass. The DSL will provide support according to the child's needs and update records about their circumstances.

8. RECORDS AND INFORMATION SHARING

Confidentiality:

At Harriers Banbury Academy, we know that timely information sharing is essential to effective safeguarding and fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety of children. All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with our data protection policies.

The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.

The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information; the DSL will make reference to this when needing to make decisions about sharing information.

If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).

8.1 Any information recorded non-electronically will be kept in a separate named file, in a secure cabinet and not with the child's academic file. These files will be the responsibility of the DSL. Child protection information will only be shared within school on the basis of 'need to know in the child's best interests' and on the understanding that it remains strictly confidential.

8.2 Child protection information will only be kept in the file and this file will be kept up to date. Records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will be stored here. All our safeguarding files will include; a chronology, contents front cover and will record significant events in the child's life.

8.3 When a child leaves our academy, the DSL will make contact with the DSL at the new school and will ensure that the child protection file is forwarded to the receiving school in an appropriately agreed manner. We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving school and/or evidence of recorded delivery. Where a parent elects to remove their child from the academy roll to home educate, the academy will make arrangements to pass any safeguarding concerns to the Home Educators Team within the Local Authority.

8.4 Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the academy will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, we will do all we can to protect the anonymity of the pupils involved in the case.

9. WORKING WITH PARENTS & CARERS

9.1 Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.
Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.
If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.
In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved.

9.2 In order to keep children safe and provide appropriate care for them, the academy requires parents / carers to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives;
- Full names and contact details of all persons with parental responsibility (if different from above);
- At least two emergency contact details (if different from above);
- Full details of any other adult authorised by the parent to collect the child from school (if different from the above).

The Academy will retain this information on the pupil file. The academy will only share information about pupils with adults who have parental responsibility for a pupil or where a parent has given permission and the academy has been supplied with the adult's full details in writing.

10. CHILD PROTECTION CONFERENCES

10.1 Children's Social Care will convene a Child Protection conference once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm. A review conference will take place once a child has been made the subject of a Child Protection Plan in order to monitor the safety of the child and the required reduction in risk.

10.2 Staff members may be asked to attend a child protection conference or core group meetings on behalf of the academy in respect of individual children. Usually the person representing the academy at these meetings will be the DSL. In any event, the person attending will need to have as much relevant up to date information about the child as possible; any member of staff may be required to contribute to this process.

10.3 All reports for child protection conferences will be prepared in advance using the guidance and template report provided by the Local Children's Social Care. The information contained in the report will be shared with parents before the conference as appropriate and will include information relating to the child's physical, emotional and intellectual development and the child's presentation at school. In order to complete such reports, all relevant information will be sought from staff working with the child in school.

10.4 Clearly child protection conferences can be upsetting for parents. We recognise that we are likely to have more contact with parents than other professionals involved. We will work in an open and honest way with any parent whose child has been referred to Children's Social Care or whose child is subject to a child protection plan or child in need plan. Our responsibility is to promote the protection and welfare of all children and our aim is to achieve this in partnership with our parents.

11. SAFER RECRUITMENT

We will ensure that at least one person on any interview/appointment panel for a post at the academy will have completed appropriate safer recruitment training. At all times the Principal

and Regional Board will ensure that safer recruitment practices are followed in accordance with the requirements of *'Keeping Children Safe in Education'*, DfE (2026).

See Appendix 3 for procedures

12. SAFER WORKING PRACTICE

12.1 All adults who come into contact with our children have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon us to ensure that all adults who work with or on behalf of our children are competent, confident and safe to do so.

12.2 All staff will be provided with a copy of our academy's Code of Conduct for Staff at induction. They will be expected to know our academy's Code of Conduct and policy for positive handling / Restraint Physical Intervention and carry out their duties in accordance with this advice. There will be occasions when some form of physical contact is inevitable, for example if a child has an accident or is hurt or is in a situation of danger to themselves or others around them. However, at all times the agreed policy for safe restraint must be adhered to.

12.3 If staff, visitors, volunteers or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff and wear a badge or lanyard identifying them. They will be expected to inform another member of staff of their whereabouts in school, who they are with and for how long. Doors, ideally, should have a clear glass panel in them and be left open.

12.4 Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. This advice can be found in *'Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings'* (2022). All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

13. Online Safety, Mobile Phones and Cameras

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

When children use the academy's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems. However, many pupils are able to access the internet using their own data plan on their personal devices.

Online and offline safeguarding risks are often connected. These may include harmful content or contact, child-on-child abuse, exploitation, cybercrime, misogynistic or harmful online influences, generative artificial intelligence, deepfakes and the creation or sharing of AI-generated sexual imagery.

Where pupils use Academy devices or systems, appropriate supervision will be provided and the effectiveness of filtering and monitoring arrangements will be reviewed regularly.

All staff who interact with children, including online, must remain alert to signs that a child may be at risk. Concerns must be reported to the DSL and managed in accordance with this policy, including referral to children's social care or the police where appropriate.

To address the risks, our academy aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology

- Set clear guidelines for the use of mobile phones for the whole school community - our academy is a mobile free zone for pupils
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, misinformation, disinformation, conspiracy theories, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism and extreme sexual or physical violence

Contact – being subjected to harmful online interaction with other users, or generative AI applications that simulate this; for example; peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images including those generated using AI and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year

Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present and will keep their phones in their bags or lockers when students are present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras

Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the academy's ICT systems and use of their mobile and smart technology

Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones

Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation

Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems

Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website https://www.harriers-aspirations.org/

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the academy.

Please also refer to the Aspirations Acceptable Use of Mobile Phones Policy and the Staff Code of Conduct.

14. MANAGING ALLEGATIONS AGAINST STAFF (including TRAINEE TEACHERS, SUPPLY STAFF, VOLUNTEERS & CONTRACTORS including HIRERS of school premises)

Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for the children at our academy. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

Any adult who receives information regarding an allegation about ***any*** adult in the academy **must inform the Principal immediately** and record this on the Staff Safeguarding platform. The principal will consider whether an onward referral to the LADO is required (taking advice from the Trust's Safeguarding Lead and/or the Director of HR) and will record their decision and rationale on the Staff Safeguarding platform.
In the event of the Principal not being available, then the information must be passed on to the DSL or the person acting as Principal. Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a trainee teacher, supply teacher, volunteer or contractor) to the Principal, you must report it directly to the local authority designated officer (LADO) and notify the Trust's Safeguarding Lead that you have done so.

Should an allegation be made about the Principal, this must be reported to the Chair of the Regional Board. If the allegation is about the Chair of the Regional Board, then the allegation must be reported to the Trust's Safeguarding Lead or the Deputy Managing Director.

This section of this policy applies to all cases in which it is alleged that a member of staff (including supply staff, volunteers, contractors and staff of organisations that hire the school premises) has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or

- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children, or
- Behaved, or may have behaved in a way that indicates they may not be suitable to work with children

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff (including trainee teachers, supply staff, volunteers and contractors and staff of organisations that hire the school premises) very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement. The **Paragraph 362 Checklist** (bullet points above) will be completed by the Principal / Chair of the RB as a starting point to support decision making when dealing with the allegation.

Suspension

Suspension **will not be** the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the academy so that the individual does not have direct contact with the child or children concerned
- Providing another member of staff to be present when the individual has contact with children
- Redeploying the individual to alternative work in the academy so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative academy or other work for the Aspirations Trust

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the principal, or chair of the Regional Board of Governors where the principal is the subject of the allegation, – the 'case manager' – will take the following steps:

- **Immediately discuss the allegation with the designated officer at the local authority (LADO).** This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed

to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

- Inform the Trust's Director of Safeguarding of the LADO referral.
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LA designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the academy is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the academy / Trust and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate. This may include who they can turn to for advice – trade union representatives, or a colleague, for example – and any academy arrangements for wellbeing counselling or advice
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the academy is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency (TRA).

Where the police are involved, wherever possible the Aspirations Trust will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the academy's disciplinary process, should this be required at a later point.

Additional considerations for trainee teachers, supply staff, contractors and staff of organisations that hire the school premises

If there are concerns or an allegation is made against someone not directly employed by the academy, such as supply staff provided by an agency, we will take the actions below in addition to our standard procedures.

- ➢ We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome
- ➢ The Principal will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the academy, while the academy carries out the investigation
- ➢ We will involve the agency fully, but the academy will take the lead in collecting the necessary information and providing it to the local authority designated officer as required
- ➢ We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the LADO whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the academy ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the Trust's HR Director will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think the individual has engaged in conduct that has harmed, or is likely to harm, a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

If the individual concerned is a member of teaching staff, the case manager and HR Director will discuss with the designated officer whether to refer the matter to the Teacher Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the academy.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the principal, or other appropriate person in the case of an allegation against the principal, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

The academy will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual. We will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the academy's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

Any member of staff or volunteer who does not feel confident to raise their concerns with the Principal or the Chair of the Regional Board should contact the LADO directly. Further national guidance can be found at: Advice on whistleblowing. The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – the helpline is available from 8:00am to 8:00pm, Monday to Friday or via e-mail: help@nspcc.org.uk.

Low Level Concerns
At Harriers Banbury Academy, we promote a culture of openness and transparency in which all concerns about all adults in the academy are dealt with promptly and appropriately. We ensure that adults working in or on behalf of the academy are clear about professional boundaries and act within these boundaries and in accordance with the ethos and values of an Aspirations Academy.
These expectations are set out in the Staff Code of Conduct and Teachers Standards and staff are regularly reminded about them.

Where a colleague has concerns that may not meet the threshold for referral to the LADO, as set out in p27 of this policy (also referred to in paragraph 360 of KCSIE 2026 as the 'harm threshold'), they must share these concerns with the Principal and record on the Staff Safeguarding platform. The Principal will then decide on the appropriate course of action to take, such as training and support for the individual concerned, or wider training if it is felt that there is a weakness in the academy's safeguarding system.

Where a low level concern is shared about a supply teacher, contractor or staff of organisations that hire the school premises, the Principal will notify their employer about the concern.

All information shared will be treated with confidentiality. Records of the details of the concern, the context and action taken will be made and kept securely. The name of the individual sharing their concern will be noted but, as far as reasonably possible, will not be communicated to the alleged individual without prior agreement.

Records will be reviewed for any patterns of behaviour so that appropriate action can be taken. Records will be kept for 6 years after the individual's employment with the organisation has ended.

A low-level concern is any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:
• is not consistent with the academy's Code of Conduct (including inappropriate conduct outside of work)
• even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children but does not meet the harms threshold

Low level concerns could be, but are not limited to:
-being over friendly with children
-having 'favourites'
-taking photos of children on their mobile phone

-using inappropriate language about children
-using inappropriate sexualised, intimidating or offensive language
-engaging with a child on a one-to-one basis in a secluded area or behind a closed door

15. Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and Aspirations central staff, will be asked to show photo ID and:

Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or

The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, **will be accompanied by a member of staff at all times.** We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

16. Non-collection of children

If a child is not collected at the end of the session/day, we will:

- Keep the child safe and calm - this may mean placing them in after school club
- Contact all persons on the child's contact list
- Send emails to parents listed on contact list
- Send text messages to parents on contact list
- Visit the home if no contact is made
- Contact the Out of hours social care team for advice 01865 833408

17. Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Complete a full and thorough search of the school premises
- Contact the child's parents
- Call the police for advice and support
- Keep the child safe and calm when found, ensuring a full debrief takes place
- Record as a serious incident

Elective Home Education

Where a parent has expressed their intention to remove a child from our academy to educate them at home, we will liaise with the LA and any other key professionals involved with the child, to coordinate a meeting with the parents/carers. The meeting will be to ensure that the best interests of the child are at the forefront of any decision being made.

18. Alternative provision

The academy will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the academy will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff and will satisfy itself that the placement is meeting the pupil's needs. The placement will be reviewed by the academy at half termly intervals to ensure it is meeting the pupil's needs, the pupil is attending and that the provision remains safe.

Those responsible for the commissioning of alternative provision will be aware that pupils in alternative provision will often have complex needs – they will be mindful of the additional risk of harm that these pupils may be vulnerable to.

19. Work experience

When a pupil is sent on work experience, the Principal will ensure that the provider has appropriate safeguarding policies and procedures in place. Where the academy has pupils conduct work experience at a school, an enhanced DBS check will be obtained if the pupil is over the age of 16.

The academy will not allow someone on the barred list to engage in regulated activity with a pupil on a work experience placement.

20. RELEVANT POLICIES

To underpin the values and ethos of our academy and our intent to ensure that pupils at our academy are appropriately safeguarded the following policies are also included under our safeguarding umbrella:

- Staff Code of Conduct
- Designated Teacher Policy
- Behaviour
- Physical Intervention
- Anti-Bullying
- Recruitment & Selection
- Whistle-blowing
- Attendance
- Online Safety
- Health and Safety including site security
- Harassment and discrimination including racial abuse
- Meeting the needs of pupils with medical conditions
- Intimate Care
- First aid
- School Trips
- Suspensions and Exclusions

We expect all staff, including those who do not work directly with children, to have read:

- Keeping Children Safe in Education (2026) [Part One]; and school leaders and staff that work directly with children should also read Annex A
- Staff Code of Conduct
- Safeguarding and Child Protection Policy
- Academy's Behaviour Policy
- Policy for Children Missing Education
- Acceptable Use Policy (staff)

16. STATUTORY FRAMEWORK

This policy has been devised in accordance with the following legislation and guidance:

- '*Working Together to Safeguard Children DfE)*', DfE (2026)
- *'Keeping Children Safe in Education'*, DfE (September 2026)
- 'What to do if you're worried a child is being abused', DfE (March 2015)
- '*The Prevent duty Guidance: '*, Home Office (2023)
- 'Mandatory Reporting of Female Genital Mutilation - procedural information', Home Office (2020)
- 'Information Sharing' DFE May 2024
- 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (updated March 2024)
- 'Channel Duty Guidance: Protecting people susceptible to radicalisation' HM Government (2023)
- DfE Guidance on Alternative Provision, updated Feb 2025

This policy also complies with our funding agreement and articles of association.

Appendix 1: Types of Abuse (from KCSiE 2025)

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse and neglect
Knowing what to look for is vital to the early identification of abuse and neglect. All staff should be aware of indicators of abuse and neglect, including exploitation, so that they are able to identify cases of children who may be in need of help or protection. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

If staff are unsure, they should always speak to the designated safeguarding lead (or a deputy).

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may also cause harm to other family members, often referred to as child to parent or caregiver abuse.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Females Women can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and their school or colleges policy and procedures for dealing with it.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

All staff should be aware that child sexual and child criminal exploitation are forms of child abuse.

Please remember if you feel unsure or worried, do something about it. Don't keep it to yourself.

Appendix 2: Safeguarding Induction Sheet for new or supply staff and regular visitors or volunteers.

We all have a statutory duty to safeguard and promote the welfare of children, and at our academy we take this responsibility seriously.

If you have any concerns about a child or young person in our academy, you must share this information immediately with our Designated Safeguarding Lead (DSL) or one of the alternate post holders.

Do not think that your worry is insignificant if it is about hygiene, appearance or behaviour – we would rather you told us as we would rather know about something that appears small than miss a worrying situation.

If you think the matter is very serious and may be related to child protection, for example, physical, emotional, sexual abuse or neglect, you must find a member of staff from the Safeguarding team detailed below and provide them with a written record of your concern.

If you are unable to locate the forms then ask a member of the academy office staff to find them and to ask them to speak with you immediately about a confidential and urgent matter.

Any allegation concerning a member of staff, a child's foster carer, a contractor or a volunteer should be reported immediately to the **Principal**. If an allegation is made about the Principal you should pass this information to the **Chair of the Regional Board or the Trust's Safeguarding Lead.** Alternatively, you can contact the Local Authority Designated Officer Jo Lloyd, lado.safeguardingchildren@oxfordshire.gov.uk or call **01865 810603.**

The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday or via e-mail: help@nspcc.org.uk.

Contact Details:
Designated Safeguarding Lead (DSL): Jo Agate
Email: jagate@harriers-aspirations.org
Contact Number:01295263067

Deputy Designated Lead: Antoinette Stephens
Email: astephens@harriers-aspirations.org

Chair of Regional Board: David Herbert
Email: Davidherbert@aspirationsacademies.org

Aspirations Safeguarding Lead: Mandy Lancy
07921 393431 mandylancy@aspirationsacademies.org

Aspirations Trust Deputy Safeguarding Lead: Aine Linney
ainelinney@aspirationsacademies.org

Aspirations Trustee with Safeguarding responsibility: Amy Rogers
amyrogers@aspirationsacademies.org

Appendix 3: Safer Recruitment and DBS Checks – policy and procedures

Please also see our Safer Recruitment Policy
To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken, including an online search
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms (all applicants must complete an application form, we will not accept a CV without an accompanying application form)

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Ask applicants to complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
    - If they have a criminal history
    - Whether they are included on the barred list
    - Whether they are prohibited from teaching
    - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
    - Any relevant overseas information
- Expect applicants to sign a declaration confirming the information they have provided is true

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns
- Involve an online search of the shortlisted candidates' history (for the previous 5 years) which is publicly available. Any possible concerns will be identified and explored at interview

Seeking references and checking employment history

We will obtain references **before the interview**. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

Appointing new staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Carry out overseas checks for anyone who has spent three months or more, overseas, in the last 5 years (https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants)
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state (checks can be made here)
- Ask for written information about previous employment history and check that information is not contradictory or incomplete

We will ensure that appropriate checks are carried out to ensure that individuals who will be working with children under the age of 5, or in our wraparound care for children under the age of 9, are not disqualified under the Childcare Disqualification (Regulations) 2018 and Childcare Act 2006.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not
- Engaging in teaching, training, instructing, caring for or supervising children often enough, or overnight, they will be in regulated activity with children **even if someone else supervises them**.

  The work is done often enough, or overnight, if it occurs:

- on more than 3 days in any 30-day period
- once overnight, between 2am and 6am

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the academy.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. When we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity volunteering with children in any setting for 3 days or more in each month
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity who are not volunteering with children for three or more days in a month. We will retain a record of this risk assessment

Governors and Members

- All trustees, governors and members will have an enhanced DBS check without barred list information and section 128 check here

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board of trustees will have their DBS check countersigned by the secretary of state.

All trustees, governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008
- Right to work in the UK
- Identity
- Other checks deemed necessary if they have lived or worked outside the UK

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity. Regulated activity would be direct supervision on more than 3 days in any 30-day period.

APPENDIX 4: FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD

